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June 1, 2017

Ms. Katherine Howard
Federal Aviation Administration
Office of Government and Industry Affairs
800 Independence Avenue SW
Orville Wright Building, FBO 10A
Washington, DC 20591

Dear Ms. Howard,

This letter is pursuant to the official comment period following the Preliminary Design Comment Phase for the NextGen Metroplex-DEN. Centennial Airport previously filed comments on June 6, 2016 following the official notice that the FAA planned to prepare an Environmental Assessment (EA) to consider the potential impacts of the implementation of the Denver Metroplex Project. Many of our comments in this letter reflect concerns previously raised, as well as new concerns. Again, we appreciate the opportunity to provide our comments on the scope of the EA and trust that the agency is soliciting comments in the spirit contemplated by FAA Order 1050.1F and by reference, the National Environmental Policy Act ("NEPA") as amended.

Adherence to the environmental review process and substantive evaluation of impacts is mandated by FAA Order 1050.1F, which requires that the FAA identify and evaluate both the direct impacts of an FAA projects and also the *cumulative impacts* of that project and other proximate projects on the environment. Order 1050.1F defines with great specificity what must be evaluated as a cumulative impact or a connected action (which are separate but related concepts under NEPA). While it is not our intention to provide comments on all categories of environmental impacts and process requirements of that Order, the incremental approach under which FAA is evaluating the environmental impacts of changes to the National Airspace System ("NAS") has led to a systematic failure to identify and mitigate cumulative impacts. This failure in turn has led to legitimate concerns expressed by citizens in virtually every community where Metroplex has been implemented. In fact, relative to the redesign of the NAS, two fundamental issues dealing with incremental versus cumulative impact analysis have not been addressed.

We applaud the FAA for its public commitment, expressed on the Denver Metroplex website, to exceed the requirements of NEPA (and Order 1050.1F) in its public disclosure and engagement. These comments are provided in the spirit of that commitment to ensure that the agency disclosures meet the standard that the agency has repeatedly set for this project: for meaningful, thoughtful, transparent and understandable public disclosure and dialogue that sets a new standard for agency openness.

The first issue, of broad concern, is that the redesign of the Denver area airspace began with the reintroduction of Area Navigation or RNAV several years ago, which introduced a number of

changes to the airspace system. While RNAV was being implemented in Denver, the FAA introduced Metroplex-DEN, to yet again make further changes to the airspace system. The environmental review of these two interrelated elements of NextGen implementation have not been evaluated as connected actions nor have the cumulative impacts of these actions been examined in any environmental document. Is Performance Based Navigation (“PBN”) next? Based upon prior experience, we can predict that, should PBN be implemented, the agency will, once again, evaluate the impacts of that technology in isolation and without regard to the impacts of the RNAV and Metroplex-DEN implementation. This approach is not only inconsistent with Order 1050.1F but it engenders community controversy and distrust that is infectious to the agency and to airport sponsors like Centennial Airport. The FAA’s approach is an example of incremental development in which a series of changes that individually may not be cause for environmental concern but collectively add up to significant changes in use. Order 1050.1F does not allow the agency to avoid complete, thorough and transparent environmental analysis by segmenting projects in the manner it has done.

The second issue is that the FAA has separated the environmental review process for evaluation of the impacts of changes in the high-altitude SIDS and STARS from the impacts of changes to the low-altitude SIDS and STARS. The environmental impacts of the high-altitude SIDS and STARS, as currently written, are insignificant other than potential improvements in air quality impacts. It is obvious; however, aircraft have to land at some point after Air Traffic Center hands off to ATC. The high-altitude changes contemplated by Metroplex will result in the lower-altitude route changes as well. Those changes will have the potential for far greater impacts to communities, including to communities that heretofore have not experienced aircraft overflight and noise exposure. As the FAA should have learned from experience with Metroplex implementation in Seattle, Phoenix, Washington, DC, Baltimore and elsewhere, these changes can result in considerable community disruption and controversy, even in areas where the noise exposure does not meet the FAA’s defined threshold of land use compatibility. The agency’s failure to disclose and analyze these lower-level route impacts is a certain set-up for the kind of political and legal controversy to occur in Denver similar to that which has dogged implementation of Metroplex plans nationwide.

Every Metroplex-DEN technical meeting has provided data and analysis exclusively on the high-altitude routes and corridors and separating those from the low-altitude approaches and departures in an out of airports. The primary stated reason for separating the routes is the different functions of the air traffic control system, e.g., Air Route Traffic Control Centers (ARTCC) versus Air Traffic Control (ATC) respectively. But, for example, replacing the high altitude PUFFR STAR with the BRNKO STAR moves arrivals to Centennial Airport some 50-60 miles to the north of the current PUFFR corridor, which inevitable will change the approaches at the lower altitudes over newly exposed areas that have historically seen little or no air traffic, In the alternative, areas that have traditionally seen some moderate traffic will see dramatically increased traffic. Many of these areas have ambient noise levels that do not exceed 45-50DNL and any overflight will be perceived as a nuisance. The FAA recently added “Dispersed Path Areas” (DPA) to the DEN-Metroplex Community Engagement process, which illustrates the above points. Unfortunately, the FAA did not include given altitudes for each area in AGL metrics, which along the foothills of the Rocky Mountains can be deceptive because of elevated terrain, which will place aircraft closer to 2,500 AGL as opposed to 9,000 MSL. Without explaining or analyzing the critical nexus between the high altitude changes and the lower altitude approach and departure routes and corridors, and without providing meaningful, transparent analysis that the public can understand, the FAA is again engaged in incremental analysis and segmentation of environmental analysis in violation of Order 1050.1F.

While Centennial Airport has not done any independent technical analysis of safety concerning some of the proposed changes, the Airport has heard from many of its users about the potential dangers of flying the PINNR STAR along the Rocky Mountain foothills. Squeezed between the Rocky Mountains on the west and the DEN Class "Bravo" cutout on the east, high volume VFR traffic and hi-speed jet traffic, often in opposite direction with little ground-to-air separation, will undoubtedly feel "pinned" flying PINNR. The FAA should conduct, and seek user comment on, a Safety Management Systems analysis of this issue.

Arapahoe County Public Airport Authority, as owner-operator of Centennial Airport, and the Centennial Airport Community Noise Roundtable have worked to address aircraft noise and overflight impacts for more than two decades. It took nearly 10 years to get our Part 150 study completed. Our noise monitoring, reporting, flight tracking and community outreach programs have been mostly successful because we have shown respect for our neighbors and have consistently acted to abate noise within the limits of our powers. Together with the Centennial Airport Community Noise Roundtable, we have made significant progress in addressing aircraft overflight and related noise concerns while simultaneously working with the FAA to achieve its objectives of modernizing the National Airspace System. The DEN RNAV process was by far the best collaborative effort among airports, communities and the FAA that I have seen in 35 years managing noise -affected airports.

Regrettably, the DEN Metroplex project has not followed the careful collaborative process that characterized the earlier DEN RNAV process. While it is obvious to insiders that the current effort is being undertaken by the FAA and not Centennial Airport, in the public's mind, there is no clean separation between actions taken by Centennial Airport and FAA-mandated changes in flight tracks in the same vicinity. Airport sponsors are the primary target for noise and overflight complaints, so the public is likely to view whatever adverse impacts result from redesigning the airspace as a problem caused by the local airport sponsor and not the FAA. For this reason, it is imperative that the FAA go above and beyond the minimum required by FAA internal policies to assure the public that its concerns are heard, understood and that impacts will be mitigated – even if the agency has a legal defense that it is not technically *required* to conduct such analysis.

If the FAA is to avoid the firestorm that has been created in many cities where Metroplex has been implemented with minimal environmental analysis (see, for example, Phoenix, Baltimore and Washington, DC), we believe that it is critically important that the FAA conduct its environmental review in a manner consistent with the community expectations. Our neighbors expect a level of transparency and disclosure that far exceeds the minimum requirements of the FAA environmental orders, and applicable Advisory Circulars. This is not an issue of whether FAA could defend its failure to conduct environmental analysis in litigation; this is an issue of transparency and trust. We firmly believe that the FAA has an obligation to respect the culture of our communities and engage in an environmental review process that is consistent with community expectations even if those expectations exceed the minimum legal requirements. Meeting those expectations is not only important to the community and to the Airport Authority but also would have meaningful benefits to the FAA (e.g., reduced litigation risk and cost; increased community acceptance of FAA decisions; substantially reduced political exposure; and, better cooperation in implementation from stakeholders).

The FAA has an obligation to respect the settled expectations of the entire Denver Metropolitan Area and, in particular, the communities surrounding Centennial Airport. The area surrounding Centennial Airport consists of one of the fastest-growing urban and suburban communities in the US. Residents

have made key life decisions, including the decision where to purchase or lease a home, where to educate their children, and where to turn for recreation or retirement, often based upon the Airport Authority's public outreach about noise impacts in these communities. We have aggressively educated both noise-affected and non-affected communities about the impacts of Centennial Airport operations and flight tracks and both people's decisions and the value of real estate have reflected this long-standing outreach. The FAA should tread with extraordinary caution if the Metroplex Project contemplates any changes in flight tracks or flight altitudes over these communities. We urge the FAA to engage and involve the Centennial Airport noise office staff to gain a better understanding of these communities and where any changes are likely to cause the disruption in settled expectations.

It is especially important that the EA disclose not only absolute noise levels (using both the traditional DNL metric as well as metrics that report number of occurrences above ambient noise level) and related impacts but also comparative or relative impacts. Reporting of changes is especially important in those areas where the Metroplex Project would cause even minimal changes that are inconsistent with (or, even worse, undermine) prior noise abatement and mitigation efforts. The FAA needs to understand and disclose the efforts that we and other airport sponsors have taken to address prior noise concerns and to explain how those historic efforts fit into the agency's Metroplex initiative. The agency needs to explain in great detail any changes to existing noise abatement flight tracks and altitudes, or flight procedures that have been adopted as the result of Part 150 planning efforts or through the Community Noise Roundtable efforts.

Purpose and Need

The FAA has already implemented selected PBN NextGen procedures in the Denver Metropolitan Area with considerable success. That success was in large part attributable to the close cooperation of Denver International Airport and its satellite airports—the only RNAV project in the nation to enjoy that level of cooperation. We are comfortable that that program was successful in part because of a collaborative effort to ensure that any flight track changes were sensitive to community expectations. It will be imperative that the FAA explain to the public why additional changes are needed, how any changes in flight tracks or altitudes contemplated by the DEN-Metroplex Project compare to the earlier NextGen RNAV changes, and what additional impacts are expected, comparing both the existing conditions and the conditions that existed prior to the earlier NextGen procedures. It will be equally important to explain to the public why additional changes beyond those made as part of RNAV are needed after only three years of operational activity, and under what conditions more changes to the Metroplex program will become necessary. For the reason explained above, FAA must fully consider cumulative impacts and connected actions and avoid both the reality and the appearance that its environmental review is impermissibly segmenting projects to avoid transparent environmental disclosure. NEPA requires the FAA to look not only at the high altitude impact but the low altitude impacts as a result of the proposed changes to arrival and departure routes.

Process

The importance of early and transparent public review and disclosure cannot be overstated. The agency's experience in metropolitan areas including Phoenix, Northern California, Seattle, Washington, DC and others demonstrates that a public participation process which satisfies the bare minimum regulatory requirements will be insufficient and inappropriate here. The public in the Denver metropolitan area will view a defense that the agency is doing whatever analysis is *required*

by FAA regulations as a bureaucratic excuse for failure to disclose potential impacts in a transparent and meaningful fashion. It is, in our view, critical that the FAA's process include the following essential components:

- Although the agency contemplates preparing an EA instead of an EIS, we recommend that the agency follow its policies with respect to scoping for an EIS. See Order 1050.1F § 7-1.2(c). A public scoping meeting would be enormously helpful in instilling confidence in the public and in local governments that the agency will not be repeating the opaque processes that were used in some other cities in connection with implementation of RNAV procedures. The recently introduced Dispersed Path Areas without further explanation, altitudes or expected traffic volume impacts is a good example.
- All affected airport sponsors within both the General Study Area and the Supplemental Boundary should be invited to participate in a meaningful and substantive manner in the design, planning and schedule for implementation of the Metroplex Project. While the FAA has conducted numerous technical meetings and added a considerable number of public outreach meetings with local officials, pilots and the public to its schedule, these outreach efforts to date have appeared to the public to be a carefully choreographed set of formal presentations rather than a meaningful dialogue about impacts, safety and alternatives
- FAA Order 1050.1F gives the agency considerable flexibility in designing a public outreach and communications plan for the EA that it tailored to community expectations. It is not enough that the FAA tell the public what it has done. It must demonstrate that it has listened to the public and adapted its program to their needs. We therefore urge in the strongest possible terms that the agency engage the affected airport sponsors and local governments in the *design* of a transparent, inclusive and meaningful public outreach and communications effort. The FAA should follow the model for public engagement that looks more like that for a major airport EIS than for an airspace EA. Airports like Centennial and other airport sponsors in the region have decades of experience designing and implementing meaningful public input and participation processes and the FAA should solicit their advice on the design of the process here. Similarly, the FAA's Airports Division is familiar with, and has developed best practices for implementing actions that are likely to have significant community reaction. To that end, although arguably not required by agency policy, we recommend that the agency follow the public engagement recommendations contained in FAA Order 5050.4B with respect to Airport Division EISs. A little more outreach than the minimum legally required may take slightly more time but will pay demonstrable benefits in the long term as the agency moves forward with the Metroplex program.
- While this EA is being prepared by a contractor to the FAA's Air Traffic Division, we recommend that that FAA establish an inter- and intra-agency oversight team to review internal drafts of working papers prior to release of the draft EA. This approach is used routinely by the FAA Airports Division for sponsor-prepared EAs to ensure that the public release of the draft EA represents the best possible work product by all affected agencies. The oversight team should include ATO and ARP representatives as well as representatives of the principal airport sponsors within the study areas and other local governments who have demonstrated an historic involvement in airport and aviation environmental issues.

- The agency has proposed that it release the draft EA for comment for 30 days. We recognize that this is the minimum required time for public comment under Order 1050.1F but request that the agency commit to considerably more time for public review. A comment period of at least 60 days, including several public meetings, is appropriate in this circumstance.

Substantive Environmental Analysis

The disclosure of the location and altitude of changes in flight tracks and the frequency of overflights at any particular location is critical. As FAA environmental protection specialists well recognize, neither the DNL metric nor the 65 decibel threshold recognized in Order 1050.1F provide particularly nuanced information about the probable impacts of changes in flight tracks at altitudes above 3000 feet AGL. In fact, the FAA is conducting a closely-held study to determine whether the current federal noise threshold is an adequate metric. As the FAA has seen in places like San Mateo County, California; Phoenix, Arizona and the northwest sections of Washington, DC., communities who have experienced changes in flight tracks as a result of implementation of NextGen procedures have become seriously concerned about impacts that exist where noise levels are less than, and in some cases substantially less than, the established 65 dB DNL threshold. This historic level of community concern is reason enough for the agency to conduct more detailed and nuanced noise analysis for this project. The metrics (e.g., in addition to DNL) and the manner of reporting of noise levels (e.g., map scale and design) should be designed with a simple principle in mind: will the data allow individual homeowners or building owners to understand whether the Metroplex program will change the number and frequency of overflights and what noise levels can be expected from individual events and cumulatively. An overlay map using population density centroids in conjunctions with NEM contours in 5 DNL increments from 75 DNL to 60DNL would be the best methodology to address this concern, and we urge the FAA to conduct such an analysis so every layperson can understand what will happen in their respective neighborhood. Any standard of disclosure less than that can predictably result in community outrage and a rerun of the disastrous public reaction that occurred in some other cities.

The General Study Area and Supplemental Boundary include not only highly urbanized areas like downtown Denver but also areas where ambient noise levels are unusually low. It is, in fact, the low ambient noise levels which makes many of the potentially affected communities attractive. Quality of life in Colorado is not just a mantra but is inexorably linked to the quality of life that has made this one of the fastest growing metropolitan areas in the nation. We recommend that the agency recognize that changes in noise level should be analyzed differently in normally quiet communities than in urbanized areas being studied. Since the study areas include urbanized areas and unusually quiet suburban and exurban areas, the FAA study should acknowledge that the threshold of annoyance is different in different portions of the study area. Of course, the FAA already has recognized that there are numerous properties protected by Section 4(f) and the essential attributes of many of these properties is either low ambient noise levels or natural quiet. The EA should analyze the impacts of the Metroplex Project consistent with these unusual characteristics. A recent letter from Colorado Governor John Hickenlooper illustrates this point. Further guidance can be found in FAA's "Guidance on Procedures for Evaluating the Potential Noise Impacts of Airport Improvement Projects on National Parks and Other Sensitive Park Environments" (2007).

The experience with implementation of Metroplex in other cities is that there are impacts which are not accurately or transparently reported through exclusive use of traditional noise impact assessment

methodologies. We strongly recommend that the FAA include in the EA the following supplemental noise analysis:

- DNL 65, 60 and 55 and 50 dB contours (along with maps of contours showing changes at a scale that individual blocks can be identified)
- Population within DNL 65, 60 and 55 and 50 dB contours
- Section 4(f) resources within the DNL 65, 60 and 55 and 50 dB contours
- SEL 70 and 75 dB contours based on the most common types of general aviation and commercial jet aircraft
- Population within SEL 70 and 75 dB contours
- Time above SEL 70 and 75 dB metric reported for representative locations throughout the General Study Area. Representative locations should be selected in coordination with cooperating agencies (including the Airport Authority), affected sponsors and local governments.
- Number of daily operations above SEL 75 and 70 reported for each representative location
- Change in location of all flight tracks below 18,000 AGL. Changes should be disclosed in detailed maps which enable the community to locate specific street blocks, not just large neighborhoods or cities. The FAA's experience in southern California (and the successful community demands for supplemental Google Earth-based mapping of new flight tracks) demonstrates the importance of this type of disclosure for building community understanding. The standard that the FAA should use in the EA is that any individual property owner should be able to determine whether there will be a change in flight track location *over his or her property*. The Airport Authority would be happy to assist in providing mapping data to the FAA to assist in this effort.
- Supplemental metrics, including TA (time above), SEL (see list above), frequency of occurrences, and change in overflight altitude should be used. The FAA's experience in northern California demonstrates that considerable community reaction can result from any significant increases in overflight frequency (almost regardless of DNL noise levels) or significant reductions in overflight altitude.

Recognizing that the above information is not required by FAA Order 1050.1F, the additional data should be provided as useful supplemental information included in, or as an appendix to, the EA. The data should be provided in both a hard-copy and electronic database format so that readers can read, analyze and understand the data (and so that technical experts can manipulate data using sophisticated GIS systems if available). We further request that all reporting of noise impacts meet the standard described above: *that any individual property owner should be able to determine whether there will be a change in flight track location over his or her property*. The display boards that have been used in public meetings to date, of course, do not even come close to that standard and are at a level of detail that it is difficult to identify flight tracks within even plus-or-minus one mile.

One of the principal purposes of this effort, like all other Metroplex initiatives, is to improve efficiency. The EA should disclose the projected efficiency gains for each proposed flight track alternative so the community can understand and compare the benefits to the environmental impacts. The FAA should also disclose the loss of efficiencies in time, fuel consumption, carbon increases and time on airframe and power plants as a result of extended flight paths proposed by the elimination of PUFFR in lieu of BRNKO. Benefits and burdens should be disclosed, for example, using the following metrics:

- Change in total time flown for each alternative compared to existing routes
- Cost savings and cost increase broken down by user group: airlines, corporate operators and other users for each alternative compared to existing routes
- Fuel burn and emissions for each alternative
- Analysis of any airspace delays for each alternative.

We would urge that the FAA learn from experiences in implementing NextGen procedures in other metropolitan areas and use the Denver Metroplex Project as a model for transparency, disclosure and true engagement; not merely checking boxes. We look forward to working closely with the agency as a cooperating agency in the design and planning for the Metroplex Project and in the environmental review of this endeavor.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Olislagers', with a long horizontal line extending to the right.

Robert P. Olislagers, A.A.E.
Chief Executive Officer

cc: Arapahoe County Public Airport Authority Board of Commissioners
Centennial Airport Community Noise Roundtable

FAA Denver Metroplex Conference Call Notes

General Timeline:

- Public information/outreach period has been ongoing. Public comment officially opened May 5th and is scheduled to close on June 5th.
 1. Following that period of time, the FAA will then consider the comments and do what they can to implement the ones which are realistic and reasonably able to be accommodated. **One of the biggest factors that they take into account is whether or not they will unduly burden one community at the expense of another by implementing a certain policy.**
- Environmental Assessment (EA) is the next step in the process. Comments are able to be submitted through various means during the EA process as well. (i.e. additional comments are permitted following the close of the official public comment period). Letters will be sent on a quarterly basis to all elected officials to keep them apprised of the Metroplex's progress. Additional workshops will be conducted next spring following the completion of the environmental assessment.
 - Full implementation of the project will not be estimated to be complete until Spring of 2019.

Questions and Answers

Question: What did the FAA do to interface with local elected officials in this process? Was it transparent and inclusive?

Answer: Local authorities only need to be notified if they are in a specifically close proximity to the airport. Historically, there has been some dispute as to which localities were appropriate to contact for certain projects, and which ones weren't. The last time that the Metroplex was reauthorized (2013), several cities and towns were left out. That caused a significant amount of problems, but still was not technically illegal.

This was a different case. All local officials were notified for this specific project via both letter and email. A second email blast was also sent to Cherry Hills and all other impacted Metro localities regarding the schedule for upcoming public workshops (12 of them total; all over the Denver Metro Area). Despite Cherry Hills being extended a formal invitation to attend, they did not take advantage of the opportunity.

Greenwood Village hosted a public comment meeting. That would have been the closest to Cherry Hills Village. However, there were also workshops hosted in Littleton, Aurora, and Parker (all within a 5-10 mile radius of her city). Many of the elected officials from surrounding cities voiced concerns which were likely to have been similar to those which she raised.

Mayor Christman's correspondence has been logged, recorded, and accounted for by the FAA at this time. They value her feedback as well as the feedback of her colleagues in surrounding local governments.

From: **Cullen, Tim (Gardner)** Tim_Cullen@gardner.senate.gov 
Subject: FAA Follow Up
Date: June 5, 2017 at 9:27 AM
To: lchristman@cherryhillsvillage.com

CT

Good Morning Mayor Christman,

I am terribly sorry about the delayed response to our conversation. Our office has been working with the FAA to make sure that your concerns are not only received, but addressed.

When I hung up with you on Friday, I reached out to one of our staffers in the Fort Collins office. Ryan Hanson has attended FAA meetings concerning the Metroplex in the past and is a wealth of knowledge on the matter. He was able to get in touch with our FAA Liaison, Leslie Lardas, and personally address the concerns of both you and Mr. Thorsen. Ms. Lardas has received your letters and the FAA is reviewing your concerns.

Ryan was also able to set up a conference call around some of these Metroplex issues and his notes are attached with specific contact information for Leslie Lardas.

Overall, there are some specific concerns which may still need to be addressed, but in general, the FAA has recorded your comments in order to take them into account moving forward. They have also acknowledged the Congressional interest in the issue, and they want to account for that in the future as well.

You will have several future opportunities to meet in person with the FAA throughout the environmental assessment period, and in additional community forums/public workshops pertaining to the Metroplex project. Furthermore, the FAA will be sending out quarterly notifications with updates on the project which you are welcome to respond to.

They cannot accommodate a one on one meeting because they are obligated to be objective, and thus cannot treat one locality differently than any other. Although, they plan to hold another meeting with all local elected officials in the future (likely after all public comments have been processed, reviewed and finalized). The details on that are pending, but stay tuned for more information from the FAA shortly.

I hope all this information is helpful. If there is anything else we can do to assist, please do not hesitate to reach out.

Tim Cullen
U.S. Sen. Cory Gardner
1125 17th Street, Suite 525
Denver, Colorado 80202
(O) 303-391-5777
(F) 202-228-7171



FAA Metroplex

Question: The Mayor is critical of the processes by which the FAA collects public input regarding their projects. She also believes that the criteria that they use to evaluate the merits of a project are flawed. Why does the FAA use the criteria that it does?

Answer: The FAA is focused on a number of criteria in the Metroplex process. However, the most important ones are always public safety and improved efficiency in the use of National Airspace. The Metroplex project is intended to accomplish both of those goals in an objective manner which ultimately serves to benefit all regional actors involved (e.g. airports, localities, businesses, environment, etc.)

For more information/data behind the intent of the Metroplex project, please review the FAA's website at: https://www.faa.gov/data_research/

Question: Will/Can the FAA accommodate an in person meeting with Mayor Christman and her colleagues in Cherry Hills Village?

Answer: They are amenable to sitting down with local elected officials again in the future, but they would have to include everybody. They cannot show favoritism to one locality over another. The time for them to do so, would likely occur during or after the comments are collected, reviewed, finalized, and the environmental assessment has begun. They welcome future correspondence to set up a meeting between all relevant stakeholders at the appropriate time.

If the Mayor has additional concerns she can contact Leslie Lardie of the FAA. Her contact information is as follows:

- Leslie Lardie
 - Federal Aviation Administration
 - Northwest Mountain Region
 - Executive Operations Staff
 1. Office: (425) 227-2040
 2. Fax (425) 227-1005

